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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

DANIEL LEE RHEES,

Defendant.

Case No. 2:23-cr-00017-APG-NJK

**STIPULATION TO CONTINUE
RESTITUTION HEARING FOR
VICTIMS 1 AND 2**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United States Attorney, and Afroza Yeasmin, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Keisha K. Matthews, Assistant Federal Public Defender, counsel for Daniel Lee Rhees, and Ellie Roohani, Esq., counsel for Victims 1 and 2 that the Restitution Hearing currently scheduled for June 24, 2025 at 1:30pm, be vacated and continued at least sixty (60) days to a date and time convenient to the Court.

This Stipulation is entered into for the following reasons:

1 1. Ms. Roohani has retained an expert to produce a report for the Court's
2 consideration as related to Victims 1 and 2.

3 2. Although the expert has not drafted her report at this time, Ms.
4 Roohani has communicated the general substance of the expert's conclusions to
5 Ms. Matthews and Ms. Yeasmin.

6 3. The Parties have been negotiating a restitution agreement.

7 4. While the Parties have reached an agreement in principle, the Parties
8 need additional time to finalize the specifics of the agreement.

9 5. If the Parties are able to finalize such an agreement, it will obviate
10 the need for a restitution hearing as related to Victims 1 and 2.

11 6. If the Parties are unable to finalize such an agreement, the retained
12 expert will need time to prepare her report, and the Parties will need time to review
13 that report.

14 7. The Government does not object to the continuance.

15 8. Victims 1 and 2 do not object to the continuance.

16 9. Mr. Rhees does not object to the continuance.

17 10. Mr. Rhees agrees that any additional time excluded by this
18 stipulation will not cause actual prejudice to him.

19 11. This continuance is not sought for purposes of delay, but to allow for
20 adequate time to prepare for the restitution hearing.

21 12. Denial of this request could result in a miscarriage of justice, and the
22 ends of justice served by granting this request outweigh the best interest of the
23 public in a speedy resolution to this case.

24 13. Mr. Rhees and Victims 1 and 2 waive any right to a restitution
25 hearing within 90 days of the sentencing date as contemplated in 18 U.S.C. §

1 3664(d)(5), and ask that the Court exclude the time requested by this continuance
2 in computing such time.

3 This is the first request for continuance filed herein.

4 DATED this 29th day of May 2025.
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6 RENE L. VALLADARES
Federal Public Defender
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SIGAH CHATTAH
United States Attorney

8 /s/ *Keisha K. Matthews*
9 By _____
10 KEISHA K. MATTHEWS
Assistant Federal Public Defender

/s/ *Afroza Yeasmin*
By _____
AFROZA YEASMIN
Assistant United States Attorney

11
12 /s/ Ellie Roohani
13 By _____
14 ELLIE ROOHANI, ESQ.
Counsel for Victims 1 and 2
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

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ORDER

Based on the Stipulation of counsel and good cause appearing

IT IS THEREFORE ORDERED that the Restitution Hearing for Victims 1 and 2 currently scheduled on June 24, 2025, at the hour of 1:30 p.m., be vacated and continued to September 3, 2025, at the hour of 9:30 a.m. in Courtroom 6C.

DATED this 30th day of May 2025.

ANDREW P. GORDON
CHIEF U.S. DISTRICT JUDGE